

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GREGORY SHEA, on behalf of
Himself and All Others Similarly
Situates,

PLAINTIFF,

v.

UNITED PARCEL SERVICE, INC.

DEFENDANT.

CASE NO. 1:07-CV-11384 (JLT)

AFFIDAVIT OF NEAL ROSSI

I, Neal Rossi, being over the age of eighteen years and duly sworn, hereby do
depose and state as follows:

1. I am employed by United Parcel Service ("UPS") as Public Relations
Manager for the East New England District. Part of my job duties in that
position involves legal matters related to employment situations in the
East New England District;
2. UPS is organized into Districts. Three UPS Districts cover parts of the
Commonwealth of Massachusetts. I have obtained information from UPS
records and personnel in each of these three Districts relative to the
number of part time hourly employees employed in the Commonwealth of
Massachusetts.
3. Currently, the East New England District employs approximately 1,693
part time hourly employees in the Commonwealth of Massachusetts.
Currently the North New England District employs approximately 953
part time hourly employees in the Commonwealth of Massachusetts.

Currently, the South New England District employs approximately 145 part time hourly employees in the Commonwealth of Massachusetts. The total number of part time hourly employees currently employed by UPS in the Commonwealth of Massachusetts is approximately 2,791.

4. While there is significant turnover among the part time hourly workforce, there have not been major changes in staffing levels at UPS in the Commonwealth of Massachusetts since July 1, 2004. The total number of part time hourly employees in the Commonwealth of Massachusetts at any given time in from then until the present should be roughly consistent with the current approximate number.

Neal Rossi

Neal Rossi

Subscribed and sworn to before me this 15th day of August 2007.

[Signature]
Notary Public
My Commission Expires:

